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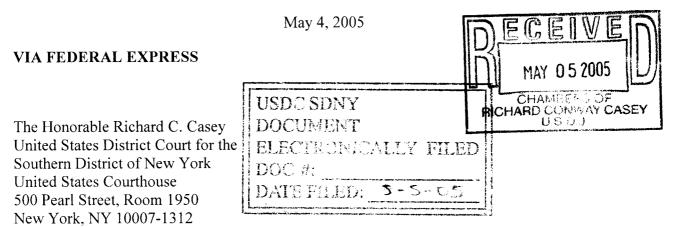
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Re: In Re: Terrorist Attack on September 11, 2001, MDL No. 1570; Federal Insurance Company et al. v. al Qaida, et al., 03 CV 6978

## Dear Judge Casey:

As Your Honor is aware, this firm represents the Plaintiffs in Federal Insurance Co., et al. v. al Qaida, et al., 03 CV 6978, one of the consolidated cases comprising In Re: Terrorist Attack of September 11, 2001, 03 MDL 1570. In an effort to make this case more manageable for the Court and all parties involved, the Federal Plaintiffs will shortly be seeking entries of default against several hundred defendants who were served some time ago, but have not appeared to defend the claims asserted against them.

In connection with the default process the *Federal* Plaintiffs intend to file schedules detailing their insureds, and the amounts paid to those insureds in compensation for property, business interruption, and related losses resulting from the September 11, 2001 Attack, as Exhibits to the default papers.

This Court has previously authorized the *Federal* Plaintiffs to file schedules identifying their insureds under seal, in order to protect the identity of those insureds from public disclosure. Copies of the Court's prior Orders relating to the filing of such schedules under seal are attached hereto for the Court's convenience. Consistent with these prior Orders, the *Federal* Plaintiffs

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write to respectfully request the Court's permission to file the schedules to be attached as Exhibits to the default filings under seal.

I thank Your Honor in advance for the Court's attention to this matter.

Respectfully submitted,

COZEN O'CONNOR

J. Scott Tarbutton By:

**JST** 

cc: Steven A Cozen, Esq. Elliott R. Feldman, Esq. Sean P. Carter, Esq.

All MDL Counsel

Application greated.
5/5/05.
Reductionship

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